



BRIGHT FROM THE START:
Georgia Department of Early Care and Learning

Nutrition Services

POLICY	No.: CACFP/02-18	Effective Date:	2/1/2002
		Revised:	7/23/2008
		Revision Effective:	7/23/2008

SUBJECT: Recordkeeping requirements for the Child and Adult Care Food Program (CACFP).

LEGAL AUTHORITY:

7 C.F.R. § 226.15 (e); 7 C.F.R. § 226.14 (a); 7 C.F.R § 226.25(b); 7 C.F.R.
§ 226.10(d); O.C.G.A. § 20-1A-5

Cross Reference/See Also:

I. PURPOSE

The purpose of this policy is to explain the recordkeeping requirements under the Child and Adult Care Food Program (CACFP).

II. APPLIES TO

This policy applies to all institutions participating in the CACFP.

III. DEFINITION(S)

"Institution" means a sponsoring organization, child care center, outside-school-hours care center, emergency shelter, or adult day care center participating in the CACFP. It also includes homeless shelters and "at-risk" after school care programs.

"Review" in the context of this policy, means an on-site investigation of program administration and operations, including but not limited to an examination of all CACFP records and documentation and an observation of a meal service by Bright from the Start, USDA, or any of their representatives. This definition also includes complaint investigations and Agreed Upon Procedure (AUP) reviews performed by representatives of Bright from the Start.

"Sponsor" or "Sponsoring organization" means a public or private nonprofit organization that is responsible for administering the food program for one or more day care home(s) or more than

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one day care center.

IV. POLICY

Institutions participating in the Child and Adult Care Food Program (CACFP) must maintain all records related to operating the CACFP. Institutions must keep all program records required by CACFP regulations and Bright from the Start policy. The consequences for failure to maintain records pursuant to the regulations and/or Bright from the Start policy include, but are not limited to, a review finding, denial of reimbursement for the period the records cover and/or being declared seriously deficient in the operation of the program.

Institutions must indicate where program records are maintained and/or located in the recordkeeping section of their application. Institutions must ensure program records are kept according to the recordkeeping section of their application and that the records are available for inspection by Bright from the Start and/or USDA or any of their representatives upon request. Failure to keep records at the location indicated in the recordkeeping section of the application will result in a finding and Bright from the Start may deny reimbursement for the period the records cover.

The following records, and any other records required by CACFP regulations and Bright from the Start policy, must be maintained at the place indicated in the recordkeeping section of the application that is completed by the institution and submitted to Bright from the Start:

- Agreement for participation;
- Application materials, including an administrative budget and a management plan;
- Roster;
- Documentation used to determine income eligibility for the participants;
- Daily and Monthly Attendance Records;
- Documentation of the enrollment of each child that includes information on each child's normal days and hours of care and the meals normally received while in care (must be updated annually and signed by a legal parent or guardian)
- Daily Menu and Food Service Record;
- Meal Count Form (DCH Providers);
- Monthly Records of Meals and Snacks Served;
- Records from financial management system that provides detailed information regarding CACFP income and expenses;
- Copies of invoices and receipts for purchases made using CACFP funds;
(Special consideration regarding receipts printed on thermal paper-
To ensure receipts printed on thermal paper remain readable,
institutions must, upon receiving such receipts, make a copy of
the receipt and attach the original to the copy. This will help

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prevent the loss of information that can occur when thermal receipts begin to fade.)

- Time sheets, time distribution reports (when applicable), payroll records and compensation plans for all labor charged to the Program;
- Time sheets or supporting records for contracted labor;
- Monthly Records of Operating Costs;
- Monthly Records of Administrative Costs, if applicable;
- Copies of all claims for reimbursement with supporting documentation, including but not limited to Title XX/Pre-K Category 1 eligibility or Title XIX documentation;
- Bank statements to demonstrate CACFP expenditures;
- Copies of menus;
- Copies of previous monitoring reports, conducted either by Bright from the Start or the sponsoring organization;
- Documentation of training attended and/or conducted;
- Monitoring records (including household contact documentation and review averaging documentation) if applicable; and
- Bright from the Start policy, policy memoranda, and correspondence.

The above list of records represent some, but not all of the records institutions are required to maintain. The types of records an institution may be required to keep will be determined by CACFP regulations, financial management instructions, or by Bright from the Start.

Institutions must have program records for the current fiscal year available for review by USDA, Bright from the Start, or any of their representatives upon initial request, which may be made during a review or at any other time. Failure to provide program records upon request during a review will result in a reclaim/disallowance of meal reimbursement for the costs or claim months that lack the supporting documentation.

Similarly, if copies of program records are requested to be submitted to Bright from the Start via mail or hand delivered, failure to submit the requested records within five (5) business days of the request, will result in the reclaim/disallowance of reimbursement for the costs or claim months that lack the supporting documentation. Bright from the Start will not return documents submitted, therefore it is imperative that copies of documentation are submitted and not original documentation. Bright from the Start will not be responsible for packages lost or not delivered to the appropriate location or person, therefore it is strongly recommended that packages submitted to Bright from the Start are adequately addressed to its intended recipient and are commercially tracked from its posting to its delivery (i.e. certified mail/return receipt delivery).

The five day deadline previously discussed is not applicable to requests for records that should be available during a review. Therefore, records should be securely maintained on-site at the

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institution or at a suitable location that allows for convenient retrieval of the records according to this policy.

In the event that the institution's designated Program Contact or a principal of an institution cannot be present at the time of a review, the Program Contact or principal must select an alternate person to access the records in their absence. The absence of the Program Contact or principal, should not hinder or prevent the reviewer from the conducting a review.

All records to support any claim(s) should be retained for the current year plus a period of three years after the date of submission of the final claim for the fiscal year to which they pertain. Sponsored facilities are required to keep all applicable records on file at the facility for three years plus the current year. Copies of all records forwarded to the sponsoring organization must be kept on file and available for review at all times by USDA, Bright from the Start, or any of their representatives.

Failure to maintain records that directly support any claim(s) for reimbursement shall result in denial of reimbursement for the period the records cover. Records that directly support claims for reimbursement include, but are not limited to, daily and monthly meal counts, rosters, income eligibility statements, enrollment documentation, Title XX documentation, monthly records of operating costs and administrative costs, time and attendance and/or time distribution reports, payroll records, and compensation plans for all labor charged to the Program.

V. PROCEDURE(S)

In order to comply with this policy, institutions must complete the following steps:

Step 1: Create record keeping procedures to ensure all required program records are complete, accurate, securely maintained, and available for review.

Step 2: Ensure that records are kept in the location indicated in the management plan recordkeeping section of the application. The recordkeeping section of the online application must be revised at any time by an institution when the location where Program records are maintained changes.

Step 3: Maintain records in accordance with CACFP regulations and Bright from the Start guidance and policies. CACFP records must be maintained for three (3) years in addition to the current fiscal (program) year. If an audit is in progress, CACFP records may be required to be maintained for a longer period.

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VI. COMMENT(S)

Any questions concerning this policy should be directed to the Policy Administrator.